

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOE ANTHONY ALANIZ, <i>PLAINTIFF,</i>	§	
	§	CIVIL ACTION NO. 4:22-cv-1991
V.	§	JURY DEMANDED
	§	
HARRIS COUNTY, TEXAS, SHERIFF ED GONZALEZ, DEPUTY VANESSA ESQUEDA, SGT. ANA ORTIZ, DEPUTY MARK CANNON <i>DEFENDANTS.</i>	§	
	§	
	§	

PLAINTIFF'S RESPONSE TO DEPUTY CANNON'S ADMISSIONS

REQUEST FOR ADMISSION NO. 1: Admit that you did not tell Deputy Cannon you had a brain tumor on May 29, 2020.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 2: Admit that you did not tell any other officer on May 29, 2020, that you had a brain tumor.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 3: Admit that no one can see your brain tumor by looking at you.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 4: Admit that your cell phone video of May 29, 2020, does not show you telling anyone you had a brain tumor.

times on May 29, 2020 to move away from the protestors, as your cell phone video shows.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 12: Admit that other officers besides Deputy Cannon told you that you had to move away from protesters on May 29, 2020, as shown on your video.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 13: Admit that Sgt. Ortiz told you to move away from protesters on May 29, 2020, as your cell phone video shows.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 14: Admit that Sgt. Ortiz told you multiple times to move away from protesters on May 29, 2020.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 15: Admit that you argued with Deputy Cannon about why you should not have to move away from protesters on May 29, 2020.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 16: Admit that you argued with Sgt. Ortiz about why you should not have to move away from protesters on May 29, 2020.

ANSWER: Admit

REQUEST FOR ADMISSION NO. 17: Admit that you pulled away from Deputy Cannon as he tried to cuff you.

ANSWER: Admit

